



DEPARTMENT OF HIGHER EDUCATION & WORKFORCE DEVELOPMENT

COMPLIANCE UPDATE **By Kim Slote, policy analyst**

CORONAVIRUS (COVID-19) IMPACT ON TITLE IV POLICIES

On March 5, 2020, the USDE published an [Electronic Announcement](#): Guidance for interruptions of study related to Coronavirus (COVID-19). This announcement provides guidance on possible scenarios that could affect Title IV, Higher Education Act requirements. The five potential student and campus scenarios that may prompt questions are listed below:

- A student was enrolled or was supposed to begin a travel-abroad experience and either the student has been called back to the U.S. or was never able to begin the travel-abroad experience;
- A student was enrolled in a program and met the requirements for full-time enrollment; however, due to the COVID-19, one or more classes – such as an internship, a clinical rotation, student teaching or fieldwork – have been cancelled and now the student has fallen below the 12 credit hour minimum and is no longer considered to be a full-time student;
- A student is quarantined and misses class or a student is incapacitated due to COVID-19 illness;
- A campus temporarily stops offering ground-based classes in order to prevent the spread of COVID-19;
- A foreign school that serves U.S. students who participate in Title IV programs temporarily suspends operations due to COVID-19.

Topics covered in the guidance that answer many of the questions include:

- Accommodating students whose enrollment is disrupted by Coronavirus
- Approval to offer distance education
- Foreign schools
- Federal Work Study
- Length of Academic Year
- Professional judgement
- Satisfactory academic progress
- Students who did not begin attendance
- Enrollment status changes
- Return of Title IV funds



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- Definition of a withdrawal date
- Date of determination and timeframes for returns
- Reentering the same payment period
- NSLDS enrollment reporting

Institutions are encouraged to visit the USDE's Coronavirus webpage at <https://www.ed.gov/coronavirus?src=feature> for frequent updates as they become available. Questions on this topic can be sent to the following email address: COVID-19@ed.gov.